

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

In re: Angela Anessa Jamerson  
Debtors

CHAPTER 13

Nationstar Mortgage LLC d/b/a Mr. Cooper,  
Movant,  
v.

BANKRUPTCY CASE NUMBER  
1:17-bk-02721-HWV

Angela Anessa Jamerson,  
Respondent/Debtors,  
and  
Jack N. Zaharopoulos, Trustee,  
Additional Respondent.

**LIMITED OBJECTION OF NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER  
TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Nationstar Mortgage LLC d/b/a Mr. Cooper, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about June 29, 2017, Debtors filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.
2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 154 Spring Meadows Road, Manchester, PA 17347.
3. Debtor's proposed plan seeks permission to sell the above property.
4. Movant is not opposed to the the Debtor selling the property; provided that any Order entered by the Court clearly specifies that such sale is contingent upon Nationstar Mortgage LLC d/b/a Mr. Cooper's lien being fully satisfied through this transaction

WHEREFORE, Nationstar Mortgage LLC d/b/a Mr. Cooper respectfully requests that confirmation of the Debtor's Plan be conditioned on this limited objection , and orders the sale of the property conditioned upon payment in full upon sale of the real property and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: 5/9/2022

BY: \_\_\_\_\_  
Kristen D. Little, Esquire  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
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LLG File #:19-062015

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**ORDER**

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2022, upon consideration of the Objection of Nationstar Mortgage LLC d/b/a Mr. Cooper to the confirmation of Debtor's Chapter 13 Plan of Reorganization, it is hereby ORDERED that the Objection is sustained in part. If the Debtor sells the property. Nationstar Mortgage is to be paid in full.

BY THE COURT:

\_\_\_\_\_  
HONORABLE HENRY W. VAN ECK  
UNITED STATES BANKRUPTCY JUDGE

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**CERTIFICATE OF SERVICE**

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Nationstar Mortgage LLC d/b/a Mr. Cooper's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on May 9, 2022:

Kara Katherine Gendron, Esquire  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101  
Sent via electronic notification karagendronecf@gmail.com

Jack N. Zaharopoulos, Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Sent via electronic notification dehartstaff@pamd13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS  
TRUE AND CORRECT.

/s/ Kristen D. Little  
Kristen D. Little, Esquire  
LOGS Legal Group LLP  
3600 Horizon Drive, Suite 150  
King of Prussia, PA 19406  
(610) 278-6800

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